

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

SNYDER’S-LANCE, INC. and  
PRINCETON VANGUARD, LLC,

Plaintiffs,

v.

FRITO-LAY NORTH AMERICA,  
INC.,

Defendant.

Case No. 3:17-CV-00652

**JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, plaintiffs Snyder’s-Lance, Inc. and Princeton Vanguard, LLC and defendant Frito-Lay North America, Inc. (the Parties), respectfully move the Court to enter a stipulated protective order to govern the Parties’ discovery in this litigation. A copy of the stipulated protective order to which the Parties have all agreed is filed with this motion.

All Parties seek the entry of this order because they anticipate that they may be required to disclose sensitive, confidential, or proprietary business information, or other confidential personal, financial, or personnel records, and/or technical or commercial information and/or trade secrets during discovery. The Parties agree that the stipulated protective order will appropriately protect the confidentiality of that information and facilitate discovery in this case.

WHEREFORE, plaintiffs Snyder’s-Lance, Inc. and Princeton Vanguard, LLC and defendant Frito-Lay North America, Inc. respectfully request that the Court enter the attached stipulated protective order.

This 7th day of January, 2019.

/s/ Alexander M. Pearce

Jonathan D. Sasser  
N.C. State Bar No. 10028  
Alexander M. Pearce  
N.C. State Bar No. 37208  
Post Office Box 33550  
Raleigh, North Carolina 27636  
Telephone: (919) 865-7000  
jon.sasser@elliswinters.com  
alex.pearce@elliswinters.com

DEBEVOISE & PLIMPTON LLP

David H. Bernstein\*  
James J. Pastore\*  
Jared I. Kagan\*  
Michael C. McGregor\*  
919 Third Avenue  
New York, New York 10022  
Telephone: (212) 909-6696  
dhbernstein@debevoise.com  
jjpastore@debevoise.com  
jikagan@debevoise.com  
mcmcgregor@debevoise.com

*Counsel for Plaintiffs Snyder's-Lance, Inc. and  
Princeton Vanguard, LLC*

\*admitted *pro hac vice*

/s/ Alice C. Richey

Alice C. Richey  
N.C. State Bar No.: 13677  
ALEXANDER RICKS PLLC  
4601 Park Road, Suite 580  
Charlotte, North Carolina 28209  
Telephone: (980) 335-0720  
Facsimile: (704) 365-3676  
alice@alexanderricks.com

William G. Barber (admitted *pro hac vice*)  
David E. Armendariz (admitted *pro hac vice*)  
PIRKEY BARBER PLLC  
600 Congress Ave.; Suite 2120  
Austin, Texas 78701  
Telephone: (512) 482-5223  
Facsimile: (512) 322-5201  
bbarber@pirkeybarber.com  
darmendariz@pirkeybarber.com

*Attorneys for Defendant*